UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

	Chapter 11
In re:	G N 22 110 (0 (ITP))
FTX TRADING LTD., et al., 1	Case No. 22-11068 (JTD)
TTA TRADING LTD., et al.,	(Jointly Administered)
Debtors.	(,
	Hearing Date: Only if objections are filed
	Objections Due: February 20, 2024 at 4:00 p.m. (ET)

THIRTEENTH MONTHLY FEE STATEMENT OF ALIXPARTNERS, LLP, FORENSIC INVESTIGATION CONSULTANT TO THE CHAPTER 11 DEBTORS AND DEBTORS-IN-POSSESSION, FOR COMPENSATION FOR PROFESSIONAL SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES INCURRED FOR THE PERIOD FROM DECEMBER 1, 2023 THROUGH DECEMBER 31, 2023

Name of Applicant:	ALIXPARTNERS, LLP
Authorized to provide professional services to:	The Debtors and Debtors-in-Possession
Date of Retention:	January 20, 2023 nunc pro tunc to November 28, 2022 [Docket No. 546]
Period for which compensation and reimbursement is sought:	December 1, 2023 through December 31, 2023
Amount of compensation sought as actual, reasonable and necessary:	\$2,281,171.00
80% of compensation sought as actual, reasonable and necessary:	\$1,824,936.80 (80% of \$2,281,171.00)
Amount of expense reimbursement sought as actual, reasonable and necessary:	\$3,123.18 ²

This is a(n): \square Monthly \square Interim \square Final application

The total time expended for fee application preparation is approximately 105.9 hours and the corresponding compensation requested is approximately \$56,264.00.

¹ The last four digits of FTX Trading Ltd.'s and Alameda Research LLC's tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at https://cases.ra.kroll.com/FTX.

² This reflects a voluntary reduction of approximately \$45,000.00 for expenses incurred during the Fee Period (as defined herein).

SUMMARY OF MONTHLY FEE STATEMENTS

Date Filed;	Period	Requested Paid		nid	Certificate of	Amount	
Docket No.	Perioa	Fees	Expenses	Fees	Expenses	No Objection	Outstanding
02/07/2023	11/28/2022 -	\$ 1.103.379.25	\$ 21,288.04	\$ 1.103.379.25	\$ 21,288.04	02/28/2023	\$ -
Docket #645	12/31/2022	\$ 1,103,379.25	\$ 21,288.04	\$ 1,103,379.25	\$ 21,288.04	Docket #780	5 -
03/06/2023	01/01/2023 -	2,114,603.25	9.074.28	2,074,632.17	9,074.28	03/17/2023	39,971.08
Docket #816	01/31/2023	2,114,005.25	9,074.28	2,074,032.17	9,074.28	Docket #1116	39,971.08
04/04/2023	02/01/2023 -	3,003,579.25	4,991.04	3,003,579.25	4,991.04	04/25/2023	
Docket #1220	02/28/2023	3,003,379.23	4,991.04	3,003,379.23	4,991.04	Docket #1346	-
05/01/2023	03/01/2023 -	4.444.875.00	72,285.60	4,444,875.00	72,285.60	05/01/2023	
Docket #1397	03/31/2023	4,444,673.00	72,283.00	4,444,673.00	72,283.00	Docket #1397	-
06/02/2023	04/01/2023 -	4,849,966.75	43,924.43	4,639,966.75	28,924.43	06/26/2023	225,000.00
Docket #1560	04/30/2023	4,049,900.73	73,727.73	4,039,900.73	20,924.43	Docket #1717	223,000.00
06/30/2023	05/01/2023 -	5,122,984.75	52,672.11	5,122,984.75	52,672.11	07/21/2023	
Docket #1820	05/31/2023	3,122,964.73	32,072.11	3,122,964.73	32,072.11	Docket #1893	-
07/31/2023	06/01/2023 -	5,053,953.75	46,599.88	5,053,953.75	46,599.88	08/24/2023	
Docket #2099	06/30/2023	3,033,933.73	40,399.88	3,033,933.73	40,599.66	Docket #2242	_
8/30/2023	07/01/2023 -	4,196,327.75	114,059.80	3,762,635.60	114,059.80	09/20/2023	433,692.15
Docket #2274	07/31/2023	4,170,327.73	114,037.00	3,702,033.00	114,037.00	Docket #2653	433,072.13
9/29/2023	08/01/2023 -	4,607,471.00	79,925.05	3,762,635.60	79,925.05	10/20/2023	844,835.40
Docket #2774	08/31/2023	4,007,471.00	79,923.03	3,702,033.00	79,923.03	Docket #3327	044,033.40
10/31/2023	09/01/2023 -	4,129,430.50	56,064.99	3,303,544.40	56,064.99	11/30/2023	825,886.10
Docket #3633	09/30/2023	4,127,430.30	30,004.77	3,303,311.10	30,004.77	Docket #4433	023,000.10
11/29/2023	10/01/2023 -	4,573,717.75	51,619.12	3,658,974.20	51,619.12	12/20/2023	914,743.55
Docket #4206	10/31/2023	4,373,717.73	31,017.12	3,030,774.20	31,017.12	Docket #4932	714,743.33
12/22/2023	11/01/2023 -	3,464,556.50	67,893.53	2,771,645.20	67,893.53	01/12/2024	692,911.30
Docket #5100	11/30/2023	3,101,330.30	07,075.55	2,771,013.20	07,075.55	Docket #5689	0,2,,,11.50
01/31/2024	12/01/2023 -	2,281,171.00	3,123.18				2,284,294.18
Docket #N/A	12/31/2023	′ ′	, ,				, ,
Subt		\$48,946,016.50	\$ 623,521.05	\$42,702,805.92	\$ 605,397.87		\$ 6,261,333.76
Less Voluntar		(39,971.08)					(39,971.08)
Less Voluntar		(210,000.00)	(15,000.00)				(225,000.00)
Less Voluntar		(380,669.79)	(53,022.36)				(433,692.15)
Tot	tal	\$48,315,375.63	\$ 555,498.69	\$42,702,805.92	\$ 605,397.87		\$ 5,562,670.53

¹ AlixPartners voluntarily agreed with the Fee Examiner to a reduction of professional fees in the amount of \$39,971.08 during the First Interim Period.

² AlixPartners voluntarily agreed with the Fee Examiner to a reduction of professional fees in the amount of \$210,000.00 and expenses in the amount of \$10,000.00 during the Second Interim Period.

³ AlixPartners voluntarily agreed with the Fee Examiner to a reduction of professional fees in the amount of \$380,669.79 and expenses in the amount of \$53,022.36 during the Third Interim Period.

SUMMARY OF HOURS AND FEES BY PROFESSIONALS¹ DECEMBER 1, 2023 THROUGH DECEMBER 31, 2023

Professional	Title	Rate	Hours	Fees
Matthew Jacques	Partner & Managing Director	\$1,280	4.3	\$ 5,504.00
Charles Cipione	Partner & Managing Director	\$1,220	9.5	11,590.00
Matthew Evans	Partner & Managing Director	\$1,220	8.3	10,126.00
David J White	Partner & Managing Director	\$1,140	18.8	21,432.00
John C LaBella	Partner	\$1,115	90.7	101,130.50
Lilly M Goldman	Partner	\$1,115	49.4	55,081.00
Thomas Hofner	Partner	\$1,115	92.6	103,249.00
Elizabeth S Kardos	Partner	\$800	4.2	3,360.00
Tao Shen	Director	\$1,070	7.0	7,490.00
Mark Cervi	Director	\$1,020	38.4	39,168.00
Anne Vanderkamp	Director	\$950	81.5	77,425.00
Brent Robison	Director	\$950	2.9	2,755.00
Steven Hanzi	Director	\$950	39.4	37,430.00
Todd Toaso	Director	\$950	62.1	58,995.00
Travis Phelan	Director	\$950	141.1	134,045.00
Jiayan Xu	Director	\$880	11.6	10,208.00
Kurt H Wessel	Director	\$880	72.2	63,536.00
Ganesh Gopalakrishnan	Senior Vice President	\$860	117.0	100,620.00
Ryan Griffith	Senior Vice President	\$855	75.0	64,125.00
Alexander Patti	Senior Vice President	\$825	142.1	117,232.50
John L Somerville	Senior Vice President	\$825	103.1	85,057.50
Bennett F Mackay	Senior Vice President	\$805	92.8	74,704.00
Matthew Birtwell	Senior Vice President	\$805	154.5	124,372.50

¹ The dates of certain meetings entries including Lewis Beischer as a participant may vary due to international component and time difference.

SUMMARY OF HOURS AND FEES BY PROFESSIONAL DECEMBER 1, 2023 THROUGH DECEMBER 31, 2023

Professional	Title	Rate	Hours	Fees
Takahiro Yamada	Senior Vice President	\$805	82.9	66,734.50
Lewis Beischer	Senior Vice President	\$805	91.6	73,738.00
Jeffrey R Berg	Senior Vice President	\$735	22.9	16,831.50
Kaitlyn A Sundt	Senior Vice President	\$585	3.1	1,813.50
Laura Capen Verry	Senior Vice President	\$540	21.9	11,826.00
Ryan Backus	Vice President	\$725	119.8	86,855.00
Chuanqi Chen	Vice President	\$605	128.2	77,561.00
Di Liang	Vice President	\$605	119.3	72,176.50
Seen Yung Wong	Vice President	\$605	94.8	57,354.00
Katerina Vasiliou	Vice President	\$585	118.4	69,264.00
Leon Schoonderwoerd	Vice President	\$585	18.2	10,647.00
Randi Self	Vice President	\$585	92.4	54,054.00
Brooke Filler	Vice President	\$510	1.9	969.00
Lisa Marie Bonito	Vice President	\$500	34.1	17,050.00
Jennifer A Bowes	Vice President	\$485	8.6	4,171.00
Jennifer Braverman	Vice President	\$485	0.8	388.00
Linna Jia	Consultant	\$555	80.0	44,400.00
Zifan Chen	Consultant	\$555	14.5	8,047.50
Allyson Calhoun	Consultant	\$510	101.9	51,969.00
Chenxi Xu	Consultant	\$510	4.8	2,448.00
Eric Mostoff	Consultant	\$510	103.1	52,581.00
Griffin Shapiro	Consultant	\$510	138.6	70,686.00
Jason Chin	Consultant	\$510	102.6	52,326.00
Olivia Braat	Consultant	\$510	79.3	40,443.00
Sean Thompson	Consultant	\$510	61.3	31,263.00
Shengjia Kang	Consultant	\$510	66.0	33,660.00

SUMMARY OF HOURS AND FEES BY PROFESSIONAL DECEMBER 1, 2023 THROUGH DECEMBER 31, 2023

Professional	Title	Rate	Hours	Fees
Ryan Stutz	Consultant	\$415	2.0	830.00
Xiaoyue Su	Consultant	\$415	11.6	4,814.00
Total Hours and Fees for Professionals			3,143.1	\$ 2,323,536.50
Less 50% Travel Fees				(42,365.50)
Total Fees for Professionals				\$ 2,281,171.00
Less 20% Holdback				(456,234.20)
Total Fees for Professionals				\$ 1,824,936.80

Average Billing Rate \$ 725.77

SUMMARY OF HOURS AND FEES BY MATTER CATEGORY¹ DECEMBER 1, 2023 THROUGH DECEMBER 31, 2023

Code	Matter Category	Hours	Fees
1.1	Chapter 11 Process / Case Management	11.6	\$ 11,304.50
1.2	Communication & Meetings with Interested Parties	18.2	16,630.00
1.3	Communication with Regulatory Parties	-	-
1.4	U.S. Trustee / Court Reporting Requirements	-	-
1.5	Forensic Analysis	185.8	115,241.00
1.6	Document Review	6.5	5,986.50
1.7	Interviews	-	-
1.8	Public Data & Research	-	-
1.9	Claims Process	-	-
1.10	eDiscovery	-	-
1.11	Reporting & Presentation of Findings	5.7	4,588.50
1.12	Preparation for / Attend Court Hearings	-	-
1.13	Retention Applications & Relationship Disclosures	5.5	3,633.00
1.14	Fee Statements & Fee Applications	105.9	56,264.00
1.15	Financial Statement Reconstruction	2,360.4	1,805,361.50
1.16	Special Investigations	325.4	219,796.50
1.31	Travel Time	118.1	42,365.50
	Total Hours and Fees by Matter Category	3,143.1	\$ 2,281,171.00

Average Billing Rate \$ 725.77

¹ The subject matter of certain time entries may be appropriate for more than one matter category. In such instances, time entries generally have been included in the most appropriate category. Time entries do not appear in more than one category.

SUMMARY OF EXPENSES¹ DECEMBER 1, 2023 THROUGH DECEMBER 31, 2023

Expense Category	Amount
Airfare	-
Client Research	2,637.52
Court Solutions	-
Ground Transportation	455.18
Internet	-
Lodging	-
Meals	30.48
Other	-
Total Expenses	\$ 3,123.18

¹ This reflects a voluntary reduction of approximately \$45,000.00 for expenses incurred during the Fee Period (as defined herein).

UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re: Chapter 11

FTX TRADING LTD., et al., 1 Case No. 22-11068 (JTD)

Debtors. (Jointly Administered)

Hearing Date: Only if objections are filed Objections Due: February 20, 2024 at 4:00 p.m. (ET)

THIRTEENTH MONTHLY FEE STATEMENT OF ALIXPARTNERS, LLP, FORENSIC INVESTIGATION CONSULTANT TO THE CHAPTER 11 DEBTORS AND DEBTORS-IN-POSSESSION, FOR COMPENSATION FOR PROFESSIONAL SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES INCURRED FOR THE PERIOD FROM DECEMBER 1, 2023 THROUGH DECEMBER 31, 2023

AlixPartners, LLP ("<u>AlixPartners</u>"), as forensic investigation consultant to the above-captioned debtors and debtors-in-possession (collectively, the "<u>Debtors</u>"), hereby submits its thirteenth monthly fee statement (the "<u>Monthly Fee Statement</u>") for allowance of compensation for professional services rendered and reimbursement of out-of-pocket expenses incurred for the period from December 1, 2023 through December 31, 2023 (the "<u>Fee Period</u>"). AlixPartners respectfully states as follows:

Jurisdiction and Venue

1. The United States Bankruptcy Court for the District of Delaware (the "Court") has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2).

¹ The last four digits of FTX Trading Ltd.'s and Alameda Research LLC's tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at https://cases.ra.kroll.com/FTX.

2. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

Relief Requested

3. The bases for the relief requested herein are Sections 330 and 331 of Title 11 of the United States Bankruptcy Code (the "Bankruptcy Code"), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), Rule 2016-2 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the "Local Rules"), the United States Trustee Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330, adopted June 11, 2013 (the "U.S. Trustee Guidelines") and the Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals [Docket No. 435] (the "Interim Compensation Order").

Background

- 4. On November 11 and November 14, 2022 (as applicable, the "<u>Petition Date</u>"), the Debtors each filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code, thereby commencing the above-captioned chapter 11 cases (the "<u>Chapter 11 Cases</u>") in this Court.
- 5. Joint administration of the Chapter 11 Cases was authorized by the Court by entry of an order on November 22, 2022 [Docket No. 128].
 - 6. No trustee or examiner has been appointed in these Chapter 11 Cases.
- 7. On December 15, 2022, the Office of the United States Trustee for the District of Delaware (the "<u>U.S. Trustee</u>") appointed the Official Committee of Unsecured Creditors (the "<u>Committee</u>") [Docket No. 231].
- 8. On December 21, 2022, the Debtors filed their Application for an Order Authorizing the Retention and Employment of AlixPartners, LLP as Forensic Investigation Consultant to the Debtors Nunc Pro Tunc to November 28, 2022 [Docket No. 277].

- 9. On January 20, 2023, the Court entered the *Order Authorizing the Retention and Employment of AlixPartners, LLP as Forensic Investigation Consultant to the Debtors Nunc Pro Tunc to November 28, 2022* [Docket No. 546] (the "Retention Order").
- 10. The Retention Order approved the terms of AlixPartners' hourly fee and expense structure set forth in the engagement letter dated November 28, 2022 (the "Engagement Letter") and authorized AlixPartners to be compensated and reimbursed pursuant to section 327 of the Bankruptcy Code in accordance with the terms of the Engagement Letter, subject to the procedures set forth in the Bankruptcy Code, Bankruptcy Rules, Local Rules, U.S. Trustee Guidelines and the Interim Compensation Order, and any other applicable orders of this Court.
- 11. Pursuant to the Engagement Letter, Matthew Evans is the Partner & Managing Director responsible for this engagement, assisted by a staff of consultants at various levels with a wide range of relevant skills and abilities.
- 12. The Interim Compensation Order provides that upon the expiration of the objection deadline (the "Objection Deadline"), a professional may file a certificate of no objection (a "CNO") with the Court with respect to any professional fees and out-of-pocket expenses not subject to objection. After a professional files a CNO, the Debtors are authorized to pay the professional 80% of the fees and 100% of the expenses not subject to an objection that are requested in the applicable Monthly Fee Application.
- 13. On March 8, 2023, the Court entered the *Order (i) Appointing Fee Examiner and (ii)*Establishing Procedures for Consideration of Requested Fee Compensation and Reimbursement of

 Expenses [Docket No. 834] appointing Katherine Sadler (the "Fee Examiner") to serve as the fee examiner in these Chapter 11 Cases and establishing certain procedures in connection therewith.

Fees and Expenses During the Fee Period

- 14. During the Fee Period, AlixPartners provided an aggregate of 3,143.1 hours of professional services in the amount of \$2,281,171.00 and incurred out-of-pocket expenses in the amount of \$3,123.18. After applying a 20% holdback of fees in the amount of \$456,234.20, AlixPartners seeks payment of 80% of fees for services rendered in the amount of \$1,824,936.80 and 100% of expenses incurred in the amount of \$3,123.18, for a total payment of \$1,828,059.98 the Fee Period.
- 15. A detailed itemization, by matter category, of all services performed by AlixPartners with respect to the Chapter 11 Cases during the Fee Period is attached hereto as **Exhibit A**. This detailed itemization complies with Local Rule 2016-2 in that each time entry contains a separate time allotment, a description of the type of activity and the subject matter of the activity, all time is billed in increments of one-tenth (1/10) of an hour, time entries are presented chronologically in categories, and all meetings or hearings are individually identified. All services for which AlixPartners requests compensation were performed for, or on behalf of, the Debtors.
- 16. A detailed list of the out-of-pocket expenses incurred during the Fee Period are attached hereto as **Exhibit B**.
 - 17. In accordance with section 330 of the Bankruptcy Code, AlixPartners seeks reimbursement only for the actual cost of such expenses to AlixPartners. AlixPartners submits that all such expenses incurred were customary, necessary and related to the Chapter 11 Cases and, by this Monthly Fee Statement, requests reimbursement of the same.

Summary of Services Rendered During the Fee Period

18. During the Fee Period, AlixPartners has conducted investigative inquiries and assisted the Debtors with (i) communications and meetings with stakeholders and their representatives;

(ii) engaging in forensic analysis of financial and accounting data, trading records, and other associated data to determine intercompany loans, conduct liability analysis, and aid asset recovery efforts; (iii) review and analysis of Debtors' historical organizational documents, policies and procedures, and internal electronical communications; (iv) research into public data of crypto markets, asset pricing, and other information regarding crypto exchanges and market participants; (v) collecting and structuring financial and accounting data to aid with forensic investigation efforts; (vi) prepare summaries from forensic investigation efforts aimed at asset recovery; and (vii) analysis of available structured and unstructured financial data to support construction of historical quarterly financial data for Debtor entities.

Services By Category Provided During the Fee Period

19. AlixPartners classified the services performed into separate categories. The descriptions below summarize the services provided by AlixPartners to the Debtors during the Fee Period.

Matter Code 1.1: Chapter 11 Process/Case Management 11.6 hours - \$11,304.50

- Organized and managed the Debtors' resources to effectively and efficiently plan, coordinate and manage the Chapter 11 process
- Reviewed and maintained dockets and case calendars
- Held working sessions to keep the engagement team informed of the latest case developments, remain aligned on the many workstreams, verify that resources are properly allocated to meet deadlines, and ensure all matters and issues are addressed in an efficient and timely manner

Matter Code 1.2: Communication & Meetings with Interested Parties 18.2 hours - \$16,630.00

• Met and communicated with, and prepared summaries for, various other Debtor professionals and/or their advisors, the U.S. Trustee, and other parties of interest

Matter Code 1.5: Forensic Analysis

185.8 hours - \$115,241.00

- Reviewed and analyzed financial data including, but not limited to, bank records, trading records, accounting or finance documents, and other data related to assets
- Traced cryptocurrency tokens and other digital assets on and off blockchains
- Analyzed smart tokens or DeFi products
- Conducted forensic analysis of digital artifacts and devices

Matter Code 1.6: Document Review

6.5 hours - \$5,986.50

• Reviewed documents including, but not limited to, memoranda, electronic communications (emails, instant messages, etc.), reports, policies and procedures

Matter Code 1.11: Reporting & Presentation of Findings

5.7 hours - \$4.588.50

- Prepared and reviewed summaries from forensic investigation efforts
- Prepared oral presentations of findings
- Presented investigative findings

Matter Code 1.13: Retention Application & Relationship Disclosures

5.5 hours - \$3,633.00

- Analyzed relationship disclosures required by the Bankruptcy Code
- Prepared updated parties in interest list for firm database
- Communications regarding AlixPartners' retention
- Drafted AlixPartners' supplemental declaration re: 2024 rate increases

Matter Code 1.14: Fee Statements & Fee Applications

105.9 hours - \$56,264.00

- Responded to inquiries from the Fee Examiner regarding the Third Interim Fee Application
- Drafted and reviewed the Twelfth Monthly Fee Statement for the period November 1, 2023 through November 30, 2023, supporting schedules and exhibits and the Fourth Interim Fee Application
- Managed the fee application process in accordance with requirements of the U.S. Trustee and/or the Court

Matter Code 1.15: Financial Statement Reconstruction

2,360.4 hours - \$1,805,361.50

- Organized and analyzed available structured and unstructured data to construct quarterly financial statements at legal entity and silo levels
- Developed database to combine disparate accounting systems to aid in analysis of accounting data and to preserve accounting data backups
- Analyzed historical accounting records to determine deficiencies, corrections and appropriate treatment

- Identified and analyzed digital assets by legal entity and determine deficiencies, corrections and appropriate treatment
- Reviewed and investigated intercompany, related party and loan transactions, analyze cash movements and identify deficiencies, corrections and appropriate treatment
- Researched and gathered data to support historical solvency analysis of the Debtors
- Prepared draft reports summarizing the process for preparing historical financial statements and the identification of crypto assets

Matter Code 1.16: Special Investigations

325.4 hours - \$219,796.50

- Managed resources and investigative efforts in support of special investigation requests from regulatory agencies, Debtors' counsel and other stakeholders
- Performed analysis to address special investigation requests from regulatory agencies, Debtors' counsel and other stakeholders
- Performed analysis in support of Debtors' causes of actions

Matter Code 1:31: Travel Time

118.1 hours - \$42,365.50

- Traveled to meetings outside of consultants' respective "home" office region (Hours billed under this category were billed at 50% of AlixPartners' standard rates)
- 20. AlixPartners believes that the fees and out-of-pocket expenses requested are reasonable, actual and for necessary services rendered or expenses incurred on behalf of the Debtors during the Fee Period.
- 21. AlixPartners has not entered into any agreement, express or implied, with any other party for the purpose of fixing or sharing fees or other compensation to be paid for professional services rendered in these Chapter 11 Cases. No promises have been received by AlixPartners or any member thereof as to compensation in connection with these Chapter 11 Cases other than in accordance with the provisions of the Bankruptcy Code.

Certification

22. A Certification of Matthew Evans is attached hereto as **Exhibit C** and incorporated herein. Matthew Evans certifies that he has reviewed the requirements of Local Rule 2016-2 and that the Monthly Fee Statement substantially complies with such rule.

Notice and No Prior Request

- 23. Notice of this Monthly Fee Statement has been given to the following parties or, in lieu of, to their counsel, if known: (a) the U.S. Trustee; (b) the Official Committee of Unsecured Creditors; and (c) all parties required to be given notice in the Interim Compensation Order. AlixPartners submits that no other or further notice is necessary.
- 24. No prior request for the relief sought in this Monthly Fee Statement has been made to this or any other Court.

Conclusion

WHEREFORE, AlixPartners, as forensic investigation consultant to the Debtors, respectfully

requests: (i) an interim allowance of compensation for professional services in the amount of

\$2,281,171.00 and reimbursement of out-of-pocket expenses in the amount of \$3,123.18 for the Fee

Period; (ii) that, upon the expiration of the Objection Deadline and entry of a CNO, the Debtors are

authorized to pay AlixPartners fees in the amount of \$1,824,936.80 (80% of \$2,281,171.00) and 100%

of out-of-pocket expenses in the amount of \$3,123.18, for a total amount of \$1,828,059.98; and

(iii) such other and further relief as this Court deems proper.

Dated: January 31, 2024

ALIXPARTNERS, LLP 909 Third Avenue, 28th Floor New York, New York 10022

/s/ Matthew Evans

By: Matthew Evans

Partner & Managing Director